

RANDALL S. LUSKEY (SBN: 240915)
rluskey@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (628) 432-5100
Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)
ratkins@paulweiss.com
JACQUELINE P. RUBIN (*Pro Hac Vice* admitted)
jrubin@paulweiss.com
YAHONNES CLEARY (*Pro Hac Vice* admitted)
ycleary@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

Attorneys for Defendant
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

[Additional Counsel Listed on Following Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION,

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING ENLARGEMENT
OF PAGE LIMITS FOR MOTION TO
DISMISS AMENDED BELLWETHER
COMPLAINTS**

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6 – 17th Floor

1 KYLE N. SMITH (*Pro Hac Vice* admitted)
ksmith@paulweiss.com
2 JESSICA E. PHILLIPS (*Pro Hac Vice* admitted)
jphillips@paulweiss.com
3 **PAUL, WEISS, RIFKIND, WHARTON**
& GARRISON LLP
4 2001 K Street, NW
Washington DC, 20006
5 Telephone: (202) 223-7300
Facsimile: (202) 223-7420
6

7 SABRINA H. STRONG (SBN: 200292)
sstrong@omm.com
8 JONATHAN SCHNELLER (SBN: 291288)
jschneller@omm.com
9 **O'MELVENY & MYERS LLP**
400 South Hope Street, 19th Floor
10 Los Angeles, CA 90071
Telephone: (213) 430-6000
11 Facsimile: (213) 430-6407
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STIPULATION

WHEREAS, on December 12, 2024, the Court ordered the parties to select ten bellwether cases each, for a total of twenty, by February 14, 2025, *see* Dkt. 1950;

WHEREAS, Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (“Uber”) submitted their bellwether selections on February 21, 2025, Dkts. 2373, 2375;

WHEREAS, Plaintiffs filed 19 amended bellwether complaints on March 14, 2025, Dkts. 2497, 2499-2516;

WHEREAS, one bellwether plaintiff, Jane Roe CL 68, “intends to proceed on her original complaint, and d[id] not seek to amend,” *see* Dkt. 2629;

WHEREAS, Uber’s Rule 12 motions to dismiss the bellwether complaints are due on or before April 15, 2025, Dkt. 1950;

WHEREAS, Plaintiffs’ oppositions to Rule 12 motions to dismiss the bellwether complaints are due on or before May 15, 2025, *id.*;

WHEREAS, Uber’s replies in support of Rule 12 motions to dismiss the bellwether complaints are due on or before June 2, 2025, *id.*;

WHEREAS, the complaints of the 20 bellwether plaintiffs raise legal questions that can be addressed in a single Rule 12 motion and, by doing so, would promote judicial economy and preserve resources;

WHEREAS, Uber requests that it be granted 40 pages for a single, omnibus Rule 12 motion, and memorandum of points and authorities in support, addressing all 20 bellwether plaintiffs’ complaints;

WHEREAS, Plaintiffs consent to Uber’s request, and further request a reciprocal extension of the page limit for a single, omnibus opposition brief of 40 pages;

WHEREAS, Uber requests that it be granted 20 pages for an omnibus reply brief in support of its Rule 12 motion, to which Plaintiffs agree;

THEREFORE, the parties respectfully request the Court enter the parties’ stipulation that:

1 1. Uber shall be granted up to 40 pages for a single, omnibus Rule 12 motion, and
2 memorandum of points and authorities in support, addressing all 20 bellwether plaintiffs'
3 complaints;

4 2. Plaintiffs shall be granted up to 40 pages for any Opposition to Uber's Rule 12 motion;

5 3. Uber shall be granted 20 pages for its reply in support of its Rule 12 motion.

6 **IT IS SO STIPULATED.**

7
8 Dated: April 11, 2025

Respectfully submitted,

9 **PAUL WEISS, RIFKIND, WHARTON &**
10 **GARRISON LLP**

11 By: /s/ Randall S. Luskey
12 RANDALL S. LUSKEY
13 ROBERT ATKINS
14 JACQUELINE P. RUBIN
15 YAHONNES CLEARY
16 KYLE N. SMITH
17 JESSICA E. PHILLIPS

18 **O'MELVENY AND MYERS LLP**

19 By: /s/ Sabrina H. Strong
20 SABRINA H. STRONG
21 JONATHAN SCHNELLER

22 *Attorneys for Defendants*
23 UBER TECHNOLOGIES, INC.,
24 RASIER, LLC, and RASIER-CA, LLC
25
26
27
28

1 Dated: April 11, 2025

Respectfully submitted,

2 **GIRARD SHARP LLP**

3
4 By: /s/ Sarah R. London

5 Sarah R. London

6 **GIRARD SHARP LLP**

601 California St., Suite 1400

San Francisco, CA 94108

Telephone: (415) 981-4800

slondon@girardsharp.com

9 Rachel B. Abrams (SBN 209316)

10 **PEIFFER WOLF CARR KANE**

CONWAY & WISE, LLP

555 Montgomery Street, Suite 820

San Francisco, CA 94111

Telephone: (415) 426-5641

rabrams@peifferwolf.com

13 Roopal P. Luhana

14 **CHAFFIN LUHANA LLP**

600 Third Avenue, Floor 12

New York, NY 10016

Telephone: (888) 480-1123

luhana@chaffinluhana.com

Co-Lead Counsel for Plaintiffs

FILER'S ATTESTATION

I, Sabrina H. Strong, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: April 11, 2025

/s/ Sabrina H. Strong
SABRINA H. STRONG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION,

Case No. 3:23-md-03084-CRB

~~PROPOSED~~ ORDER REGARDING
ENLARGEMENT OF PAGE LIMITS FOR
MOTION TO DISMISS AMENDED
BELLWETHER COMPLAINTS

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6 – 17th Floor

The Court hereby GRANTS the parties' stipulation as follows:

1. Uber shall be granted up to 40 pages for a single, omnibus Rule 12 motion, and memorandum of points and authorities in support, addressing all 20 bellwether plaintiffs' complaints;
2. Plaintiffs shall be granted up to 40 pages for any Opposition to Uber's Rule 12 motion;
3. Uber shall be granted 20 pages for its reply in support of its Rule 12 motion.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April 14, 2025

